

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JORGE SALCEDO, *et al.*,

Defendants.

Criminal No. 19-10081-IT-MPK

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME AND LEAVE TO FILE
A MEMORANDUM OF LAW NOT TO EXCEED 33-PAGES IN OPPOSITION
TO DEFENDANT’S MOTION FOR ISSUANCE OF PRETRIAL SUBPOENAS**

1. On January 23, 2020, Defendant Jorge Salcedo filed a 33-page motion seeking the issuance of subpoenas to the University of California, Los Angeles and the Regents of the University of California (together “the “UC entities”). Dkt # 373. The UC entities object to the issuance of the subpoenas on numerous grounds, including that they do not seek relevant or admissible evidence and are not specific, as required by Federal Rule of Criminal Procedure 17(c). The UC entities therefore bring this motion to request the Court’s leave to file an opposition brief to Defendant Salcedo’s motion of up to 33 pages in length, which would be due on or before February 28, 2020.

2. Allowing the UC entities until the end February to respond to Defendant Salcedo’s motion will permit sufficient time for the UC entities to address the many factual inaccuracies and legal issues raised by Defendant Salcedo’s 33-page motion, and for their lead counsel in California to seek *pro hac vice* admission to this Court. A filing deadline at the end of February also will not delay the proceedings. Indeed, under this schedule, the matter will move

more quickly than the pace at which objections to subpoenas in similar matters have been handled. *See, e.g.*, Case 1:19-cr-10080-NMG, Dkt. # 532 (University of Southern California's motion to quash subpoena by Defendant Zangrillo filed 43 days after motion for issuance).

3. A 33-page limit for the opposition brief is also fair and reasonable, as it tracks the number of pages in Defendant Salcedo's motion for issuance of the subpoenas. *See* Dkt. # 373.

4. For these reasons, the UC entities respectfully request that the Court enter an order allowing them to file an opposition brief of up to 33 pages in length on or before February 28, 2020.

5. Pursuant to Local Rule 7.1(a)(2), counsel for the UC entities has conferred with counsel for Defendant Salcedo and counsel does not oppose the requested extension of time and page limit.

Dated: February 3, 2020

Respectfully Submitted,

/s/ Diana K. Lloyd

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Diana K. Lloyd

Diana K. Lloyd